

From: [Jump, Christine](#)
To: [Michael Stephenson](#); [SMITH, MARTIN L](#)
Cc: [Akhter Hossain](#)
Subject: Reporting Limits and Detection Limits table
Date: Monday, July 07, 2014 3:11:00 PM

Mike-

I have a couple of concerns about the table referenced above.

- 1) In the notes, RL is defined as the Reporting Limit. In a previous conversation, you told me that the RL for this project would also be the Quantitation Limit. (QL). This needs to be stated or included in the definition of RL, since RLs may vary depending on the Lab or at a clients' request.
- 2) 1,4-Dioxane does not appear to be included on this table, and must be added.
- 3) There are a lot of NAs listed as the IAO on this table. NA is not defined in the table and EPA does not believe NA is an appropriate Interim Action Objective. EPA realizes that many of the compounds with the NAs were not detected during the RFI phases, however, detection levels and required analyses varied between phases and that is not a guarantee that those compounds will not be detected during the closure sampling. It is EPA's understanding that the compounds with NAs were not listed in the KDHR RSK manual; however, many of those chemicals are listed in the EPA RSL tables. Please propose an IAO for these compounds or propose a method of determining an IAO.
- 4) The table states, "Other compounds to be analyzed at a frequency of 10% of the total VOC analyses, where specified." Since elevated metals have been detected in several locations across the site, EPA will require that metals be analyzed at the same frequency as VOCs.

Please call me if you would like to discuss these comments before submitting a response.

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